

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re: MICHAEL O. FLOWERS &)	
MARINDA L. FLOWERS,)	Case No. 22-10808-JDL
)	Chapter 13
Debtor(s))	

**DEBTOR'S OBJECTION TO AMENDED MOTION FOR ORDER LIFTING THE
AUTOMATIC STAY WITH BRIEF IN SUPPORT**

Debtors, Michael O. Flowers and Marinda L. Flowers, hereby object to Bonda, LLC's Amended Motion For Order Lifting the Automatic Stay and in support thereof would allege and state as follows:

1. The Debtor's filed for Chapter 13 Bankruptcy on April 25, 2022.
2. The Debtor's 341/Confirmation Hearing is currently scheduled for June 16, 2022, at 8:15 am.
3. The Debtor's Chapter 13 Plan proposes to pay 100% back to all general unsecured creditors which includes the claim of Bonda, LLC, in the amount of \$18,250.00.
4. Debtor's hereby incorporates the Chapter 13 Trustee's limited Objection to Bonda, LLC being granted relief from the automatic stay and request that Bonda, LLC's relief be limited to determining liability and damages.
5. The only basis for Bonda's motion for relief is that it wants to continue litigation in state court where it has already begun. Had Bonda already obtained a judgment in its state court action, Bonda would not have any grounds or need to seek relief from the automatic stay.

Wherefore, premises considered, Debtors pray that Bonda, LLC's Amended Motion for Order Lifting the Automatic Stay be denied or limited in the scope of the relief sought.

MICHAEL AND MARINDA FLOWERS

By: /s/ o. Clifton Gooding
O. CLIFTON GOODING (OBA #10315)

OF THE FIRM:

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Attorneys for MICHAEL AND MARINDA
FLOWERS

NOTICE OF HEARING

You are hereby notified that a hearing on the Amended Motion for Order Lifting the Automatic Stay filed by Bonda, LLC is set for hearing on June 28, 2022, at 2:00 p.m. before the Honorable Janice D. Loyd, in the 2nd Floor Courtroom, US Bankruptcy Court for the Western District, 215 Dean A. McGee, Oklahoma City, Oklahoma 73102.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June 2022 copies of the above referenced document were forwarded via U.S. Mail, first class, postage prepaid and properly addressed to the following at the addresses listed below:

Michael and Marina Flowers
15228 Claremont Blvd
Edmond, OK 73013

/s/ O. Clifton Gooding
O. Clifton Gooding